Document Title: Remedial Alternatives Technical Memorandum for the Lower Ley Creek Subsite of the Onondaga Lake Superfund Site
Version: Final, May 2013

Reviewer	Cmt. #	Comment	Location		Comment Response
			Sec.	Page	
	1.	Please explain why isolation layer for the soil cap needs to be impermeable, especially in wetland areas.	7.1.2		The soil cap has been modified to be a 1 foot thick vegetated habitat layer in the Draft Feasibility Study (FS). A new description of the soil cap is found in Section 7.1.2.
	2.	The habitat layers for both the soil and sediment remedies should be 1 foot in thickness.			The habitat layers for both the soil and sediment are 1 foot in thickness in the Draft FS.
	3.	Please show all calculations used in determining the thickness of the caps.	Appendix E		Calculations and the determination of the type and thickness of the granular sediment cap are exhibited in Appendix E of the Draft FS.
	4.	The sediment alternative should include a habitat layer over the armor stone, if used.	Appendix E		A habitat layer has been added to the armor stone sediment cap design. This is detailed in Appendix E of the Draft FS.
	5.	ES-2 para starts with "soil samples" – what was detected above restricted use? Do not use unrestricted use for soils in an industrial area, please use restricted use for all soil areas.		ES-2	For soil alternatives, restricted use cleanup goals for soil were based on 6 New York Codes, Rules and Regulations (NYCRR) Part 375 Soil Cleanup Objectives (SCOs) for Commercial Use.
	6.	If the excavation performed prior to capping (for the sole purpose of maintaining bathymetry) will remove all of the contaminated sediment, then a cap is not required.		7-6	We concur. The sediment alternatives have been modified so that no sediment capping is recommended for areas where the contamination is shallower than 2 feet deep.
	7.	Please show the calculations for the 2 ft sand cap	7.2.4	7-6	Calculations and the determination of the type and thickness of the granular sediment cap are exhibited in Appendix E of the Draft FS.

594312

Document Title: Remedial Alternatives Technical Memorandum for the Lower Ley Creek Subsite of the Onondaga Lake Superfund Site Version: Final, May 2013					
Reviewer	**Cmt. #**	**Comment**	**Location**		**Comment Response**
			Sec.	**Page**	
	8.	Why would Murphy's Island be impacted? Impacts should be avoided by the use of engineering controls, if necessary.			A description of Murphy's Island has been added to Section 2.1.2.9 of the Draft FS. Also in this section, it is stated that all the remediation alternatives in this Draft FS have controls in place that will ensure that Murphy's Island will not be affected by any remediation activities.
	9.	Can the excavation be done in the dry to eliminate short-term risks? Especially in the shallow areas. If excavation in the dry is not an advantage over excavation in the wet and vice versa, please explain why.	7.2.2	7-6	For the FS, it is assumed that excavation in the dry will be done in the shallower areas of Lower Ley Creek (i.e., the upstream section of Lower Ley Creek), while excavation in the wet will be completed in the deeper areas of the creek.
	10.	How can the benthic community be buried if you have to excavate before you cap?		8-25	We concur. The benthic community will be excavated and not buried. We have made this correction in Section 8 where appropriate.
	11.	Please provide an explanation and/or show calculations as to how the erosion and depositional areas were determined.		Fig 4.3	A detailed explanation and associated calculations for determining erosion and depositional areas is included in Appendix E of the Draft FS.
	12.	The 2 foot excavation area should not include Crouse Hinds landfill areas.		Fig 7.1	We concur. The soil alternatives have been modified to not include Crouse Hind landfill areas in the Draft FS except in the buffer area adjacent to Lower Ley Creek.
	13.	The Town of Salina garage and Bear Trap creek should not be included in the target areas. Driveways, parking lots, lawn areas, developed areas and Bear Trap Creek were not used as depositional areas during the 1970's dredging of Ley creek and should not be included when determining soil excavation areas.		Fig 7.2	The Town of Salina Garage, Bear Trap Creek, and other developed areas have been removed from all relevant soil alternatives.

Document Title: Remedial Alternatives Technical Memorandum for the Lower Ley Creek Subsite of the Onondaga Lake Superfund Site Version: Final, May 2013					
Reviewer	**Cmt. #**	**Comment**	**Location**		**Comment Response**
			Sec.	**Page**	
	14.	Please recheck these figures.		Fig 7.5 and 7.7	These figures have been rechecked and modified based on discussions with USEPA and NYSDEC.
	15.	What cleanup goal was used to determine volumes?			For the FS, a 1 mg/kg concentration of PCBs was used as a restricted use cleanup goal for sediments at Lower Ley Creek. Restricted use cleanup goals for soil were based on 6 NYCRR Part 375 SCOs for Commercial Use.
	16.	Why is there a difference between 0-25 ppm and 25-49 ppm in unit cost?			In the Draft FS, the PCB disposal costs have been modified to include unit costs for 0-50 ppm, 50-500 ppm, and 500+ ppm.
	17.	Figure 7.4 looks like it includes Crouse Hinds and it shouldn't.		Fig 7.4	Figure 7.4 has been modified to not include Crouse-Hinds Landfill.
	18.	Please cost out all alternatives for both on-site disposal (including TSCA cell disposal) and off-site disposal.	Appendix C		All alternatives have been costed based on both on-site disposal (including TSCA cell disposal) and off-site disposal in the Draft FS. See Appendix C
	19.	Add the cost of a phase 1a cultural resource study into the design costs.			The cost of a Phase 1A cultural resource study has been added to the design costs in the Draft FS.
	20.	Some areas contain .500 ppm PCBs which is a principal threat waste and has to be handles separately. This should have its own unit cost.			In the Draft FS, the PCB disposal costs have been modified to include unit costs for 0-50 ppm, 50-500 ppm, and 500+ ppm.
	21.	The time frame for achieving RAOs should be included for each remedial alternative.	7.0		The time frames for achieving RAOs are included at the end of each remedial alternative discussion in Section 7.

Document Title: Remedial Alternatives Technical Memorandum for the Lower Ley Creek Subsite of the Onondaga Lake Superfund Site Version: Final, May 2013					
Reviewer	**Cmt. #**	**Comment**	**Location**		**Comment Response**
			Sec.	**Page**	
	22.	Odor control has been a considerable cost for the Onondaga Lake remediation. If similar controls will be necessary for the Lower Ley Creek remediation, please add them. If not, please explain why not.			Due to the low levels of volatile organic compounds in Lower Ley Creek, odor controls will not be necessary during remediation activities. This is explained in Section 8 of the Draft FS under the Short-Term Effectiveness subsections.
	23.	The cost of habitat/wetland restoration should be included in the alternatives.			The cost of habitat/wetland restoration has been included in the alternatives.